Case 2:19-cr-00240-JAM Document 23 Filed 10/15/20 Page 1 of 3

1 2	HEATHER E. WILLIAMS, #122664 Federal Defender LEXI NEGIN, #250376
3	Assistant Federal Defender 801 I Street, 3 rd Floor
4	Sacramento, CA 95814 Tel: 916-498-5700
5	Fax: 916-498-5710 Lexi_negin@fd.org
6	
7	Attorney for Defendant VICTOR BARRAZA
8	IN THE UNITED STATES DISTRICT COURT
9	
10	FOR THE EASTERN DISTRICT OF CALIFORNIA
11	UNITED STATES OF AMERICA,) Case No. 2:19-cr-00240-JAM
12	Plaintiff, Plaintiff, STIPULATION AND ORDER TO CONTINUE STATUS CONFERENCE
13	vs.) Date: October 20, 2020
14	VICTOR BARRAZA,) Time: 9:30 a.m.
15) Judge: Hon. John A. Mendez Defendant.
16	
17	IT IS HEDEDY STIDLY ATED by and between the newtice through their respective
18	IT IS HEREBY STIPULATED by and between the parties through their respective
19	counsel, United States Attorney McGregor W. Scott, through Assistant United States Attorney
20	Justin Lee, attorneys for Plaintiff and Federal Defender Heather Williams, through Assistant
21	Federal Defender Lexi Negin, attorneys for defendant Victor Barraza that the Status Conference
22	set for October 20, 2020 be continued to December 15, 2020.
23	In light of the COVID-19 pandemic, defense counsel requires additional time to review
24	discovery, conduct investigation and mitigation.
25	Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
26	excluded from this order's date through and including December 15, 2020, pursuant to 18 U.S.C.
27	§3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,
28	

Case 2:19-cr-00240-JAM Document 23 Filed 10/15/20 Page 2 of 3 1 based upon defense preparation. 2 3 Respectfully submitted, 4 Dated:October 14, 2020 HEATHER E. WILLIAMS Federal Defender 5 s/ Lexi Negin 6 LEXI NEĞIN Assistant Federal Defender 7 Attorney for Defendant VICTOR BARRAZA 8 9 Dated: October 14, 2020 McGREGOR W. SCOTT 10 **United States Attorney** 11 /s/ Justin Lee **JUSTIN LEE** 12 Assistant Unied States Attorney Attorney for Plaintiff 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

Case 2:19-cr-00240-JAM Document 23 Filed 10/15/20 Page 3 of 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

26

27

28

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including December 15, 2020, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the October 20, 2020 status conference shall be continued until December 15, 2020, at 9:30 a.m.

DATED: October 14, 2020 /s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ UNITED STATES DISTRICT COURT JUDGE